

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)
)
Plaintiffs,)
v.) No. 1:23-cv-00108-LMB-JFA
)
GOOGLE LLC,)
)
Defendant.)

**JOINT MOTION FOR ENTRY OF DISCOVERY SCHEDULE
AND EXTENSION OF DEADLINES FOR RESPONSE TO COMPLAINT**

1. Plaintiffs United States, the Commonwealth of Virginia, and the States of California, Colorado, Connecticut, New Jersey, New York, Rhode Island, and Tennessee (“Plaintiffs”) initiated this action on January 24, 2023. ECF 1. Defendant Google LLC (“Google”) waived service of the summons and complaint, and its response to the complaint is currently due on or before March 27, 2023. ECF 35.

2. By order dated March 14, 2023, the Court ordered the parties to file their proposed discovery schedule within fourteen days. ECF 61.

3. The parties have met and conferred regarding a proposed discovery schedule, as well as a proposed schedule for Google’s response to the complaint and any associated briefing on a motion to dismiss.

4. In light of the complexity of this case, the parties jointly request that a Scheduling Order be issued containing the following dates:

- a. Fact discovery will commence on March 27, 2023.
- b. The parties shall jointly submit a proposed discovery plan pursuant to Federal Rule of Civil Procedure 26(f) on or before March 28, 2023, noting any areas of disagreement between the parties.

- c. Initial disclosures will be served on or before April 3, 2023.
- d. Google's response to the complaint shall be filed on or before May 5, 2023.
- e. Plaintiffs' response to any motion to dismiss (if one is filed) shall be filed on or before June 2, 2023.
- f. Google's reply in support of any motion to dismiss shall be filed on or before June 23, 2023.
- g. A hearing on any motion to dismiss shall be noticed for hearing on June 30, 2023 at 10:00 a.m.
- h. Substantial completion of document productions in connection with fact discovery shall be completed on or before August 4, 2023.
- i. Fact discovery shall conclude on November 10, 2023, and expert discovery shall commence immediately upon the conclusion of fact discovery.
- j. Plaintiffs' expert reports shall be submitted on or before January 12, 2024.
- k. Defendant's expert reports shall be submitted on or before March 4, 2024.
- l. Plaintiffs' reply expert reports shall be submitted on or before April 22, 2024.
- m. Expert discovery shall conclude on May 31, 2024.
- n. A final pretrial conference shall be held on July 18, 2024 at 10:00a.m.

Dated: March 17, 2023

Respectfully submitted,

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